



October 9, 2015

Victoria Wachino, Director
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
200 Independence Avenue, Southwest
Washington, DC 20201

Re: Response to Washington State Application for Medicaid Transformation Waiver

Dear Ms. Wachino,

On behalf of the Cascade Pacific Action Alliance, we write to offer qualified support of Washington's proposed Medicaid Transformation 1115 waiver. Our region's support is contingent on the waiver providing clear, demonstrable support for our region's local health priorities, which emphasize population health improvements, and provision of the right level and type of support to the Cascade Pacific Action Alliance to be successful as a coordinating entity.

Background

The Cascade Pacific Action Alliance (CPAA) is a state-designated Accountable Community of Health serving Cowlitz, Lewis, Mason, Thurston, Pacific, Grays Harbor, and Wahkiakum Counties in central western and southwest Washington. This region includes both rural and urban communities coming together to identify their most pressing health needs. Invariably, the focus of the regional council is often on the needs of vulnerable populations, especially low-income individuals and families, and those living with complex and chronic health issues. This includes residents suffering from mental health conditions and substance use disorders, who tend to stress our community infrastructures across multiple community sectors (health care, criminal justice, and housing, for example).

The CPAA is made up of multi-sector stakeholders. The sectors include behavioral health providers, community-based social service organizations, education service districts, hospitals, Medicaid Managed Care Organizations, pediatricians, primary care providers, public health, and other community sectors, all working together to improve health in the region through collective impact. By bringing together multi-sector stakeholders, they can make decisions that affect the whole community. The CPAA adheres to the guiding principle of better health and better quality at less cost (the Triple Aim). The CPAA developed shared regional health priorities to focus acting and planning together to improve individual and community safety and well-being.

Backbone Organization

CHOICE Regional Health Network, a 501(c)(3) nonprofit, is the backbone organization that supports the Cascade Pacific Action Alliance. CHOICE has nearly two decades of experience leading successful health improvement initiatives in the region. CHOICE's role as the backbone organization is to manage project



timelines, engage stakeholders, support local community forums and the regional council, establish shared measurement tools, and support the development of a Regional Health Improvement Plan for implementation in our region.

Achieving Accountable Community of Health Designation

Building a strong and robust Accountable Community of Health is a prerequisite for success in achieving the Triple Aim. In order to achieve better health and better quality at less cost, Accountable Communities of Health were developed to recognize and leverage innovation and collaboration already occurring in local communities. The CPAA has completed the necessary membership, structure, and governance steps to set the right path for both promoting specific transformation strategies and projects while also serving as the umbrella group for advancing health improvement in the region and fostering health system change.

Regional Health Improvement Plan

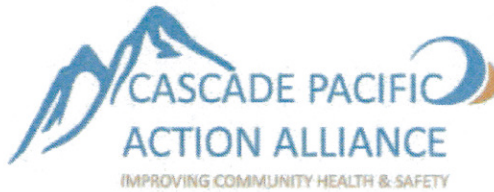
While the CPAA is currently still finalizing its initial Regional Health Improvement Plan, the group has begun work on a cross-sector pilot project to identify children with behavioral health challenges (mental health and chemical dependency) as early as possible in both education and health care settings, and connect at-risk children with appropriate community-based interventions and treatment services. Through criteria developed by cross-sectoral leaders from throughout the region, four potential pilot sites were chosen based on high Adverse Childhood Experience (ACE) scores, a balanced mix of urban and rural schools, the school's (and school district's) interest in participating, and available community resources. We believe that this pilot offers real promise for improving access to health care, behavioral health, and social support services and improving care coordination utilizing multiple sectors. If successful, we will be looking to scale up across the region from our initial four school test sites.

The work on our Regional Health Improvement Plan provides a window into our current efforts. The list of shared regional health priorities, as seen below, offers the right blend of health care and social determinants of health work that has been identified in the waiver application as the key to sustainable health improvement for individuals, systems, and the health care pocketbook.

- Prevention and mitigation of adverse childhood experiences,
- Improving health care access and provider capacity,
- Improving care coordination and integration,
- Improving chronic conditions prevention and management, and
- Enhancing economic and educational opportunities in the region.

Medicaid Transformation through CPAA Partnerships

While the details of the CPAA's role in Medicaid transformation are still emerging, the CPAA is well-positioned to assess and articulate the region's needs for health system capacity development, care delivery redesign, and population health improvements. The members who make up the CPAA represent organizations who are either within or can engage with the delivery system, e.g., community



support, criminal justice, education, and Managed Care Plans, and carry out the transformative changes. Given its unique cross-sector and regional composition, the CPAA is able to provide important linkages to local communities, thereby amplifying the impact of Medicaid transformation by facilitating alignment across stakeholders and communities in our region. By design, the CPAA has membership that spans beyond the traditional health care delivery system, thus supporting the ability for the region to incorporate and address the social determinants of health within Medicaid transformation.

In order to achieve this community-driven innovation and transformation, state infrastructure and incentives that meaningfully engage the community at large and the individual consumer will be critical. To this end, the CPAA encourages the development of relevant state agency collaboration in order to leverage and coordinate resources to advance key community-driven transformation projects.

Population Health Improvement

The CPAA is squarely focused on improving the health of our communities. We believe firmly that in order to improve health outcomes for our residents, we must address both the social determinants of poor health as well as provide high-quality medical care. The Medicaid population is one (albeit important) demographic target of the work of this ACH. However, the CPAA is committed to the principles of prevention and broad population health for *all* of our community members.

Commitment to Medicaid Transformation

The CPPA is very interested in achieving improvements in the health of our communities through the implementation of the Medicaid Transformation Waiver. We support the innovative thinking embodied in the state's waiver application and how it connects strongly with the underlying principles of Healthier Washington. We are especially interested in the population health concepts embedded in the waiver. As many in the health care field now acknowledge, there is growing recognition that improving health outcomes is as much (or even more) about addressing the social determinants of poor health as it is about providing high-quality medical care. While there might be conceptual agreement around the importance of improving population health, successful operational models—especially those involving the Medicaid population—are still needed. This waiver application offers the promise of bridging the gap between broad population health models and specific interventions with the Medicaid population. We would be most excited to see transformation projects chosen that successfully integrate clinical health care with social, public health, and/or community-based interventions like housing assistance, food access, and early childhood education.

Coordinating Entity

The CPPA is committed to strong implementation of the Medicaid Transformation Waiver as a regional coordinating entity, presuming the appropriate support and guidance from the Health Care Authority is provided. While CPAA has built a strong foundation, as demonstrated above, fulfilling this role will



require tenacity, rapid growth, investment and development as well as nimbleness. Within the waiver application the state listed a number of work group opportunities to engage stakeholders in collective and transparent development of core components of the waiver. As the waiver moves forward, we support CMS and the state providing adequate time allotted for the CPAA to engage during the negotiation process. The CPAA looks forward to more information regarding the steps to further develop this important work, and its members are committed to active participation. We are already working with our many community partners and the various state agencies to improve the health of our communities and the wellbeing of our residents, and see great opportunity to accelerate this effort through the Medicaid Transformation Waiver.

On behalf of the CPAA,

Winfried Danke

Executive Director

CHOICE Regional Health Network

CPAA Backbone Organization